

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SIX SIS AG,

Defendant.

Adv. Pro. No. 12-01195 (CGM)

**STIPULATION AND ORDER REGARDING FILING OF
REPLY IN FURTHER SUPPORT OF MOTION TO DISMISS**

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant SIX SIS AG (“Defendant” and, with the Trustee, the “Parties”), by and through their respective and undersigned counsel, state as follows:

WHEREAS, on October 24, 2022, the parties filed and the Court so-ordered a Second Amended Stipulation and Order setting December 13, 2022 as the deadline for Defendant to respond to the Second Amended Complaint in the above-captioned action; February 7, 2023 as the deadline for the Trustee to respond to any filed motion to dismiss; and March 7, 2023 as the deadline for Defendant to file a reply. ECF No. 128;

WHEREAS, on December 13, 2022, Defendant timely filed a Motion and Memorandum of Law to Dismiss the Trustee’s Second Amended Complaint (the “Motion”). ECF Nos. 130–136. Defendant noticed the Motion for hearing on April 19, 2023, at 10:00 a.m.;

WHEREAS, on February 7, 2023, the Trustee timely filed his Opposition to Defendant’s Motion. ECF Nos. 137–138;

WHEREAS, Defendant has requested additional time to file its reply and the Trustee has consented to the extension.

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IT IS HEREBY STIPULATED AND AGREED that the deadline for Defendant to file a reply in further support of its Motion shall be extended to and including March 14, 2023.

Dated: March 6, 2023
New York, New York

/s/ David J. Sheehan
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*Special Counsel for Irving H. Picard, Trustee
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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

SO ORDERED.

4

**Dated: March 7, 2023
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**